



March 30, 2011

1300 I Street, NW, Suite 400 West
Washington, DC 20005

Phone 202 515-2540
Fax 202 336-7922
tamara.preiss@verizon.com

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Implementation of Section 224 of the Act Amendment of the Commission's Rules and Policies Governing Pole Attachments, WC Docket No. 07-245

A National Broadband Plan for Our Future, GN Docket No. 09-51

Reexamination of Roaming Obligations of Commercial Mobile Radio Service Providers, WT Docket No. 05-265

Petitions Regarding the Use of Signal Boosters and Other Signal Amplification Techniques Used with Wireless Services, WT Docket No. 10-4

Dear Ms. Dortch:

On March 29, 2011, Kathleen Grillo and Katherine Saunders of Verizon and John Scott of Verizon Wireless met with Commissioner Meredith Attwell Baker, Charles Mathias, Senior Legal Advisor, and Brad Gillen, Legal Advisor, on the above pending proceedings.

With regard to pole attachments, we explained that, as the Commission's National Broadband Plan acknowledges, providing a low, uniform rate for pole attachments will benefit consumers by encouraging broadband deployment, particularly in rural areas. We noted that under the current regime, competing broadband providers pay vastly different rates for the same types of attachments and service offerings, which gives some broadband providers an unfair competitive advantage over Verizon. We also explained that many of these existing joint agreements are decades old, and contain evergreen clauses that make re-negotiation of them difficult absent Commission action. Thus, we explained that the pole attachment rates currently paid by Verizon (as an ILEC) are not just or reasonable when they are significantly higher than the rates paid by Verizon's competitors for the same types of pole attachments. Thus, to meet its obligations under section 224, we urged the Commission to adopt a uniform rate formula for pole attachments that could serve as a benchmark for further negotiations.

With regard to data roaming, we reiterated points made in our prior filings in the record of that proceeding that Verizon Wireless has entered into and continues to negotiate data

Marlene H. Dortch

March 30, 2011

Page 2

roaming agreements, including 3G data roaming, and that the record supplies neither a factual nor a legal basis for the Commission to adopt a data roaming mandate.

With regard to signal boosters, we noted that Verizon supports CTIA's 2007 Petition for Declaratory Ruling that it is unlawful to operate boosters without a license or consent of the licensee, but we expressed concern about interim rules regarding acceptable booster design.

This letter is being filed electronically pursuant to Section 1.1206 of the Commission's Rules. Should you have any questions regarding this letter, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Jonathan L. Green". The signature is written in a cursive, flowing style.

cc: Commissioner Meredith Attwell Baker
Charles Mathias
Brad Gillen